

1 NINA F. LOCKER, State Bar No. 123838  
nlocker@wsgr.com  
2 STEVEN GUGGENHEIM, State Bar No. 201386  
sguggenheim@wsgr.com  
3 JONI OSTLER, State Bar No. 230009  
jostler@wsgr.com  
4 JESSICA L. SNORGRASS, State Bar No. 259962  
jsnorgrass@wsgr.com  
5 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
6 650 Page Mill Road  
Palo Alto, CA 94304-1050  
7 Telephone: (650) 493-9300  
Facsimile: (650) 565-5100

9 Attorneys for Defendants Kevin Johnson,  
10 Scott Kriens, Pradeep Sindhu, Robert M. Calderoni,  
11 Mary B. Cranston, Robyn M. Denholm,  
12 John Michael Lawrie, Stratton Sclavos,  
William R. Stensrud, William Meehan,  
David Schlotterbeck, Mercedes Johnson,  
and Nominal Defendant  
Juniper Networks, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

1 Plaintiffs Olga Ratinova and Lisa E. Coppola (“Plaintiffs”), and defendants Kevin  
2 Johnson, Scott Kriens, Pradeep Sindhu, Robert M. Calderoni, Mary B. Cranston, Robyn M.  
3 Denholm, John Michael Lawrie, Stratton Sclavos, William R. Stensrud, William Meehan, David  
4 Schlotterbeck, Mercedes Johnson, and Nominal Defendant Juniper Networks, Inc.  
5 (“Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, on September 27, 2011, plaintiff Olga Ratinova filed a Verified Shareholder  
7 Derivative Complaint titled *Ratinova v. Johnson et al*, Case No.: 11-CV-04792-LHK (the  
8 “Ratinova Action”);

9 WHEREAS, on December 28, 2011, plaintiff Lisa E. Coppola, IRA, filed a Verified  
10 Shareholder Derivative Complaint titled *Coppola v. Juniper Networks, Inc. et al*, Case No. 11-  
11 CV-06667-LHK (the “Coppola Action”);

12 WHEREAS, on January 30, 2012, the Court granted the parties’ stipulation to consolidate  
13 the Ratinova Action and the Coppola Action under the caption *In re Juniper Networks, Inc.*  
14 *Shareholder Derivative Litigation*, Case No. 11-CV-04792-LHK, and appointed the law firms  
15 Levi & Korsinsky, LLP and the Law Offices of David A. Bain, LLC as co-lead counsel for  
16 Plaintiffs, and Bramson, Plutzik, Mahler & Birkhaeuser as liaison counsel for Plaintiffs;

17 WHEREAS, on February 6, 2012, the Court granted the parties’ stipulation to stay  
18 proceedings in this action until an order was entered by the Court denying the motion to dismiss  
19 in the related class action, *City of Royal Oak Retirement System v. Juniper Networks, Inc., et al.*,  
20 Case No. 11-CV-04003-LHK (the “Class Action”);

21 WHEREAS, on July 23, 2012, the Court granted nominal defendant Juniper Networks,  
22 Inc. (“Juniper”)’s Motion to Dismiss the First Amended Complaint in the Class Action without  
23 prejudice, and granted defendant Scott Kriens’ Motion to Dismiss the First Amended Complaint  
24 in the Class Action without prejudice;

25 WHEREAS, on May 17, 2013, the Court granted Defendants’ Motion to Dismiss the  
26 Second Amended Complaint in the Class Action with prejudice;

27  
28

1 WHEREAS, on July 8, 2013, the Court ordered the parties to file, by July 12, 2013, either  
2 a Stipulation of Dismissal or a Joint Status Report setting forth good cause why the case should  
3 not be dismissed;

4 WHEREAS, the parties to this Stipulation believe that this action should be dismissed  
5 without prejudice; and

6 WHEREAS, Plaintiffs and Defendants agree that all parties will bear their own fees and  
7 costs incurred in connection with this litigation;

8           NOW, THEREFORE, the parties, by and through their undersigned counsel, hereby  
9 agree and stipulate to the following:

- 10 (1) The above-captioned action shall be dismissed without prejudice; and  
11 (2) Plaintiffs and Defendants will bear their own fees and costs.

12 SO STIPULATED.

13 | Dated: July 12, 2013

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

14  
15 By: s/ Joni Ostler  
Joni Ostler

16 Nina F. Locker  
17 Steven Guggenheim  
18 Jessica L. Snorgrass  
650 Page Mill Road  
Palo Alto, CA 94304

22 | Dated: July 12, 2013

LEVI & KORSINKY, LLP

24 By: s/ Douglas E. Julie  
25 Douglas E. Julie  
*Admitted Pro Hac Vice*

26 *Attorneys for Plaintiffs Olga Ratinova and Lisa E. Coppola, IRA*

1 Dated: July 12, 2013

LAW OFFICES OF DAVID A. BAIN, LLC

2 By: s/ David A. Bain  
3 David A. Bain  
4 *Admitted Pro Hac Vice*

5 *Attorneys for Plaintiff Lisa E. Coppola, IRA*

6 Dated: July 12, 2013

7 BRAMSON, PLUTZIK, MAHLER &  
8 BIRKHAEUSER

9 By: s/ Alan R. Plutzik  
10 Alan R. Plutzik

11 2125 Oak Grove Road, Suite 120  
12 Walnut Creek, CA 94598  
13 E-mail: aplutzik@bramsonplutzik.com

14 *Attorneys for Plaintiffs Olga Ratinova and*  
15 *Lisa E. Coppola, IRA*

16 **[PROPOSED] ORDER**

17 Good cause appearing, it is hereby ORDERED:

- 18 (1) The above-captioned action shall be dismissed without prejudice; and  
19 (2) Plaintiffs and Defendants will bear their own fees and costs.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Clerk shall close the file.

21 Dated: July 13, 2013

22   
23 Hon. Lucy H. Koh

## **ECF CERTIFICATION**

I, Joni Ostler, am the ECF User whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER OF DISMISSAL**. I hereby attest that Douglas E. Julie, David A. Bain, and Alan R. Plutzik have concurred in this filing.

Dated: July 12, 2013

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: s/ Joni Ostler  
Joni Ostler